

ITT

"Contains NO CBI"

ITT Corporation

World Headquarters

James F. Wittmer, M.D.

Vice President

Director - Health, Environment, and Safety

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(A)

CAP ID No. 8ECAP-0018

August 27, 1992

8EHQ-92-12423

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Document Processing Center (TS-790)
Office of Pollution Prevention and Toxics
U.S. Environment Protection Agency
401 M Street, S.W.
Washington, DC 20460

Attn: TSCA Section 8(e) Coordinator (CAP) Agreement

Dear Sir or Madam:

ITT hereby submits this Final Report to the U.S. Environmental Protection Agency as required under Unit II.C.4 of the "Registration and Agreement for TSCA Section 8(e) Compliance Audit Program" (CAP). This "final report" summarizes file searches conducted in an attempt to identify studies or reports containing information determined to be reportable under Phase I of the Compliance Audit Program. Final reports under Phase II, if any, will be delivered to EPA as part of ITT's "second final report" which is due to EPA no later than six months after EPA publishes additional guidance on such reporting.

ITT Corporation is a diversified company with operations in more than thirty countries around the world, and several hundred locations here in the United States. The majority of these perform no manufacturing. Those that do, are engaged primarily in assembly and metalworking.

As a participant in the Compliance Audit Program (CAP) offered by EPA, ITT completed a document search of its files dating from January 1, 1977, to determine whether any pertinent, substantial health risk information reportable under TSCA section 8(e) had not been reported to EPA. A directive to search all appropriate files was made to all the ITT companies, and in turn to all units of ITT companies located in the United States. The criteria for this search were based on guidelines published by EPA.

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9/17/95

ITT 3 PAGES

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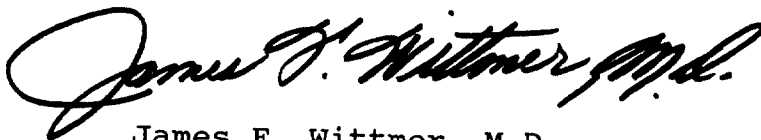
CAP ID No. 8ECAP-0018
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The documents that were reviewed included human health studies, toxicological studies (environmental, animal, cell, etc.), industrial hygiene monitoring reports, occupational health files, OSHA 200 forms, accident reports, and workers compensation files. In addition, we reviewed Material Safety Data Sheets for imported materials to look for health effects not already described in the literature.

All potentially reportable studies were forwarded to ITT Headquarters where they were subjected to review by three Certified Industrial Hygienists, a Certified Occupational Health Physician, and three attorneys. Further review was performed by Technology Sciences Group (TSG) and McKenna & Cuneo. After reviewing the submitted information, the ITT Review Board concluded that two reports should have been reported to EPA as required by TSCA Section 8(e). These reports which are attached relate to units that have been divested by ITT.

We look forward to participation in Phase II of CAP. Please contact us if you have any questions relative to this Phase I final report.

Submitted by:



James F. Wittmer, M.D.
Name

Vice President, Director-Health,
Environment and Safety
Title

Final Phase I CAP Audit Report

ITT

CAP Identification Number 8ECAP-0018

Date: August 27 1992

ITT hereby submits the following studies or reports pursuant to its Registration and Agreement for the TSCA Section 8(e) Compliance Audit Program:

Studies Involving Effects on Humans

1. Asbestosis in a vermiculite worker (Attachment A).
2. Lip cancer from exposure to hexavalent chromium in an employee with weakened immune system (Attachment B).

Other Studies or Reports

None

(4)

Attachment A: Asbestosis in a vermiculite worker at O. M. Scott

O. M. Scott was a wholly owned subsidiary of ITT Corporation until it was divested in 1986. Early in 1978, benign lung effects were observed to be associated with Scott workers who processed vermiculite ore and were exposed to contaminating, asbestiform minerals in certain of those ores. O. M. Scott notified EPA by letter (December 5, 1978), and provided EPA with summaries of the medical cases of the affected workers (December 29, 1979). These submissions were recorded as TSCA Section 8(e) "FYI notices".

In addition to receiving written notification, on November 29, 1978, representatives of EPA's Office of Toxic Substances attended a meeting at O. M. Scott, during which the details of our findings, including air monitoring data and records of the sources of the ores used, were discussed.

Following the initial findings, O. M. Scott commissioned a comprehensive epidemiological study of its vermiculite workers, which was performed by the University of Cincinnati. A copy of the final report of the study was sent to EPA's Office of Toxic Substances on March 10, 1982.

After Scott's notification, EPA initiated its own investigation of possible health hazards associated with asbestos-contaminated vermiculite. At a meeting on January 6, 1981, EPA and O. M. Scott representatives reviewed information developed by each party related to asbestos exposures from working with vermiculite. Based on our records, EPA was aware of the benign lung effects among Scott's workers and of the asbestos contamination of certain vermiculite ores.

In September 1982, one of the vermiculite workers at Scott was diagnosed with asbestosis.

Attachment B: Lip cancer from exposure to
hexavalent chromium in an employee with a weakened
immune system at ITT Jennings.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

James Wittmer, M.D., Vice President
Director - Health, Environment, and Safety
ITT Corporation
1330 Avenue of the Americas
New York, New York 10019-5490

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 24 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan

Terry R. O'Bryan
Risk Analysis Branch

Enclosure

12423A



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contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: APR 20 1995

NON-CAP

CAP

Submission number: 124234

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.): _____

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only

entire document 0 1 2 pages 1,2 pages 1,2,3,4,5

Notes:

Contractor reviewer : PAR Date: 3/27/95

CECATS/TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA: Submission # BEHQ. 0892 -12423 SEQ. A

TYPE: INT SUPP FLWP
SUBMITTER NAME: ITT Corporation

INFORMATION REQUESTED: FLWP DATE: _____
0501 NO INFO REQUESTED
0502 INFO REQUESTED (TECH)
0503 INFO REQUESTED (VOL ACTIONS)
0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:
0639 REFER TO CHEMICAL SCREENING
0678 CAP NOTICE

0401 VOLUNTARY ACTIONS
0402 NO ACTION REPORTED
0403 STUDIES PLANNED (IN HUMAN)
0404 NOTIFICATION OF WORKING WITH MS
0405 LABELING (TRIAGE)
0406 PROCESSING (TRIAGE)
0407 APP/USE DISCONTINUED
0408 PRODUCTION DISCONTINUED
0409 CONFIDENTIAL

SUB. DATE: 08/27/92 OTS DATE: 08/31/92 CSRAD DATE: 02/17/95

CHEMICAL NAME: hexavalent chromium
vermiculite

8540-29-9
1318-00-9
1332-21-4

INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C
<u>0201</u> ONCO (HUMAN)	<u>01 02 04</u>	<u>0216</u> EPICLIN	<u>01 02 04</u>	<u>0241</u> IMMUNO (ANIMAL)	01 02 04
<u>0202</u> ONCO (ANIMAL)	01 02 04	<u>0217</u> HUMAN EXPOS (PROD CONTAM)	01 02 04	<u>0242</u> IMMUNO (HUMAN)	01 02 04
<u>0203</u> CELL TRANS (IN VITRO)	01 02 04	<u>0218</u> HUMAN EXPOS (ACCIDENTAL)	<u>01 02 04</u>	<u>0243</u> CHEM/PHYS PROP	0 02 04
<u>0204</u> MUTA (IN VITRO)	01 02 04	<u>0219</u> HUMAN EXPOS (MONITORING)	01 02 04	<u>0244</u> CLASTO (IN VITRO)	01 02 04
<u>0205</u> MUTA (IN VIVO)	01 02 04	<u>0220</u> ECO/AQUA TOX	01 02 04	<u>0245</u> CLASTO (ANIMAL)	01 02 04
<u>0206</u> REPRO/TERATO (HUMAN)	01 02 04	<u>0221</u> ENV. OCCURENCE/FATE	01 02 04	<u>0246</u> CLASTO (HUMAN)	01 02 04
<u>0207</u> REPRO/TERATO (ANIMAL)	01 02 04	<u>0222</u> EMER INCI OF ENV CONTAM	01 02 04	<u>0247</u> DNA DAM/REPAIR	01 02 04
<u>0208</u> NEURO (HUMAN)	01 02 04	<u>0223</u> RESPONSE REQUEST DELAY	01 02 04	<u>0248</u> PROD/USE/PROC	01 02 04
<u>0209</u> NEURO (ANIMAL)	01 02 04	<u>0224</u> PRODCOMP/CHEM ID	01 02 04	<u>0251</u> MSDS	01 02 04
<u>0210</u> ACUTE TOX. (HUMAN)	01 02 04	<u>0225</u> REPORTING RATIONALE	01 02 04	<u>0259</u> OTHER	01 02 04
<u>0211</u> CHR. TOX. (HUMAN)	01 02 04	<u>0226</u> CONFIDENTIAL	01 02 04		
<u>0212</u> ACUTE TOX. (ANIMAL)	01 02 04	<u>0227</u> ALLERG (HUMAN)	01 02 04		
<u>0213</u> SUB ACUTE TOX (ANIMAL)	01 02 04	<u>0228</u> ALLERG (ANIMAL)	01 02 04		
<u>0214</u> SUB CHRONIC TOX (ANIMAL)	01 02 04	<u>0239</u> METAB/PHARMACO (ANIMAL)	01 02 04		
<u>0215</u> CHRONIC TOX (ANIMAL)	01 02 04	<u>0240</u> METAB/PHARMACO (HUMAN)	01 02 04		

USE: _____ PRODUCTION: _____

TOXICOLOGICAL CONCERN:

SPECIES

ONGOING REVIEW

TRIAGE DATA: NON-CBI INVENTORY

YES (DROP/REFER)
NO (CONTINUE)
REFR

CAS SR
YES
NO
IN HUMAN

10/19/92

Tox Concern

ID

12423A-01

EPI

L

COMMENT

SUBMISSION (1992) CONSISTS OF TWO DIVERSE SUMMARIES OF PRIOR INCIDENTS. (1) A 1982 CASE REPORT OF ASBESTOSIS IN A WORKER EXPOSED TO VERMICULITE ORES. THE COHORT HAS BEEN STUDIED AND THE HAZARD IS WELL DOCUMENTED. (2) AN UPDATED CASE REPORT OF LIP CANCER IN A WORKER EXPOSED TO HEXAVALENT CHROMIUM. THIS CARCINOGENIC HAZARD HAS BEEN WELL DOCUMENTED.

Tox Concern

ID

12423A-02

EPI

L

COMMENT

SUBMISSION (1992) CONSISTS OF TWO DIVERSE SUMMARIES OF PRIOR INCIDENTS. (1) A 1982 CASE REPORT OF ASBESTOSIS IN A WORKER EXPOSED TO VERMICULITE ORES. THE COHORT HAS BEEN STUDIED AND THE HAZARD IS WELL DOCUMENTED. (2) AN UPDATED CASE REPORT OF LIP CANCER IN A WORKER EXPOSED TO HEXAVALENT CHROMIUM. THIS CARCINOGENIC HAZARD HAS BEEN WELL DOCUMENTED.